

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
MLCJR LLC, <i>et al.</i> , ¹)	
)	Case No. 23-90324 (CML)
Debtors.)	
)	(Jointly Administered)
)	

**GOM SHELF, LLC’S WITNESS AND EXHIBIT LIST
FOR HEARING ON TRUSTEE’S RELINQUISHMENT/ABANDONMENT
MOTION SCHEDULED FOR HEARING ON JANUARY 28, 2025
[Relates to Docket No. 2341]**

GOM Shelf LLC (“GOM Shelf”) files this Witness and Exhibit List for the hearing to be held on **Tuesday, January 28, 2025, at 1:00 p.m.** (prevailing Central Time).

Witnesses

1. Greg LaBove, via declaration and/or live testimony;
2. Any witness called or listed by any other party in interest; and
3. Impeachment witnesses, as necessary.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: MLCJR LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL Oil & Gas, LLC (9562); and M21K, LLC (3978). The Debtors’ address is 4514 Cole Ave, Suite 1175, Dallas, Texas 75205.

Exhibits

Ex.	Date	Docket No.	Description
1	01/27/2025	2352	<i>Declaration of Gregory LaBove in Support of GOM's Limited Objection to the Trustee's Motion to Relinquish or Abandon Certain Federal Leases [Docket No. 2341]</i>
2	02/10/2024	1626	<i>Order (A) Approving the Purchase and Sale Agreement with Natural Resources Worldwide LLC (B) Authorizing the Sale of Certain Assets of the Debtors Free and Clear of Liens, Claims, Encumbrances and Interests, (C) Authorizing the Assumption and Assignment of Certain Contracts and Leases, and (D) Granting Related Relief entered on February 10, 2024</i>
3.	02/14/2024	1642	<i>Notice of Filing Amendment to Purchase and Sale Agreement with Natural Resources Worldwide, LLC [Docket No. 1642]</i>
4.	01/8/2025	2341-1	Proposed order attached to the Trustee's Relinquishment/Abandonment Motion [Docket No. 2341-1]
5.	02/15/2024	1644	<i>Notice of Closing Date Under Purchase and Sale Agreement with Natural Resources Worldwide, LLC</i>
6.			Any document or pleading filed with the Court in the above-captioned cases.
7.			Any exhibit necessary for impeachment purposes.
8.			Any exhibit identified or offered by any other party.

Reservation of Rights

GOM Shelf reserves the right to supplement or otherwise amend this Witness and Exhibit List.

Respectfully submitted this 27th day of January, 2025.

GRAY REED

By: /s/ James J. Ormiston

James J. Ormiston
Texas Bar No. 15307500
Jason S. Brookner
Texas Bar No. 24033684
Micheal W. Bishop
Texas Bar No. 02354860

1300 Post Oak Boulevard, Suite 2000
Houston, Texas 77056
Telephone: (713) 986-7000
Facsimile: (713) 986-7100
Email: jormiston@grayreed.com
jbrookner@grayreed.com
mbishop@grayreed.com
kleonard@grayreed.com

Counsel to GOM Shelf, LLC

Certificate of Service

The undersigned hereby certifies that on January 27, 2025, he caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on all parties authorized to receive electronic notice in this case.

/s/ James J. Ormiston

James J. Ormiston